

**LOCAL BANKRUPTCY FORM 5071-1**  
**THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance:

**Parties are trying to resolve the matter and request to continue to January 25, 2018**

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

**Dated:**  
**December 19, 2017**

/s/ Thomas Song, Esquire  
Thomas Song, Esq., Id. No. 89834  
Phelan Hallinan Diamond & Jones, LLP  
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Philadelphia, PA 19103  
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**THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

<b>IN RE:</b>	:	
<b>DANIEL J. CHATTERTON</b>	:	<b>BK. No. 1:16-bk-01511-RNO</b>
<b>A/K/A DAN J. CHATTERTON</b>	:	
<b>Debtor</b>	:	<b>Chapter No. 13</b>
 <b>DITECH FINANCIAL LLC</b>	:	
<b>Movant</b>	:	<b>11 U.S.C. §362</b>
v.	:	
<b>DANIEL J. CHATTERTON</b>	:	<b>Name of Proceeding: MOTION FOR</b>
<b>A/K/A DAN J. CHATTERTON</b>	:	<b>RELIEF FROM THE AUTOMATIC</b>
<b>Respondent</b>	:	<b>STAY</b>
		<b>Document # 62</b>

**CERTIFICATION OF SERVICE**

**TO THE BANKRUPTCY COURT CLERK:**

Service upon the following persons was made by sending a true and correct copy of the Request to Continue Hearing/Trial with Concurrence by first class mail or electronic means on the date listed below.

CHARLES J DEHART, III, ESQUIRE (TRUSTEE)  
8125 ADAMS DRIVE, SUITE A  
HUMMELSTOWN, PA 17036

DANIEL J. CHATTERTON  
763 SOUTH RAILROAD STREET  
PALMYRA, PA 17078

TRACY LYNN UPDIKE, ESQUIRE  
2080 LINGLESTOWN ROAD STE. 201  
HARRISBURG, PA 17110

UNITED STATES TRUSTEE  
228 WALNUT STREET, SUITE 1190  
HARRISBURG, PA 17101

**DATE: December 19, 2017**

/s/ Thomas Song, Esquire  
Thomas Song, Esq., Id. No. 89834  
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